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Marilyn Burgess - District Clerk Harris County
Envelope No. 67217854
By: Wanda Chambers
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2022-49614 / Court: 215

NO. _____

TAMEKA HILLS-ROBERTS)(IN THE DISTRICT COURT OF
)(
V.)(HARRIS COUNTY, TEXAS
)(
PATRICK LEWIS, JR. and)(
WERNER ENTERPRISES, INC.)(_____ JUDICIAL DISTRICT

PLAINTIFF'S ORIGINAL PETITION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW TAMEKA HILLS-ROBERTS (hereinafter referred to as "PLAINTIFF"), and files this Original Petition complaining of PATRICK LEWIS, JR. and WERNER ENTERPRISES, INC. (hereinafter referred to as "DEFENDANTS"), and for cause of action would respectfully show unto the Court as follows:

I.

Pursuant to Tex. R. Civ. P. 190.1, Plaintiff intends for discovery in this cause of action to be conducted in accordance with Tex. R. Civ. P. 190.3 ("Level 2"),

II.

The Plaintiff is a resident of Harris County, Texas.

The Defendant PATRICK LEWIS, JR. is a resident of Harris County, Texas, and may be served with citation at 6522 Leedale St., Houston, Texas 77016, or at any other location where this Defendant may be found or served.

The Defendant WERNER ENTERPRISES, INC. is a business entity doing business in the State of Texas and Harris County. Said Defendant may be served with citation by serving its registered agent for service, Corporate Creations Network Inc., 5444 Westheimer #1000, Houston, Texas 77056.



III.

On or about October 25, 2020, the vehicle occupied by Plaintiff was struck by a commercial motor vehicle operated by Defendant PATRICK LEWIS, JR. in Houston, Harris County, Texas. The Plaintiff would show that the acts and/or omissions of Defendant PATRICK LEWIS, JR. constituted negligence and served as a proximate cause of the collision in question, and the damages for which recovery is sought herein. Additionally, Plaintiff contends that said Defendant PATRICK LEWIS, JR. was negligent per se by violating one or more provisions of the Texas Transportation Code.

IV.

Plaintiff would further show that Defendant WERNER ENTERPRISES, INC. is liable under the theory of respondent superior. Based upon information and belief, Defendant PATRICK LEWIS, JR. was serving in the course and scope of his employment or agency relationship with the Defendant WERNER ENTERPRISES, INC. at the time of his tortious acts and/or omissions set forth above. Accordingly, Defendant WERNER ENTERPRISES, INC. is vicariously liable for all damages proximately caused by the tortious acts and/or omissions of Defendant PATRICK LEWIS, JR.

V.

DAMAGES

Pursuant to Tex. R. Civ. P. 47(c), and pleading to the Court alone, Plaintiff seeks monetary relief more than \$1,000,000.00. Plaintiff's damages include the following:

- (1) Medical and health care expenses incurred in the past;
- (2) Medical and health care expenses that, in a reasonable probability, will be incurred in the future;
- (3) Past and future physical pain;

- (4) Past and future mental anguish and suffering;
- (5) Physical impairment, past and future;
- (6) Lost wages/loss of earning capacity, both past and future;
- (7) Pre-judgment and post-judgment interest at the legal rate;
- (8) Costs of Court; and
- (9) Such other damages that may be established at the time of trial.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that the Defendants be cited to appear and answer herein as required by law, and upon final trial and hearing hereof, the Plaintiff have and recover damages from the Defendants, together with costs of court, pre-judgment and post-judgment interest at the legal rate, and such other and further relief, general and special, legal and equitable, to which Plaintiff may be justly entitled.

Respectfully submitted,

LAW OFFICES OF SCOTT C. LANNIE, P.C.

/s/ *Scott C. Lannie*

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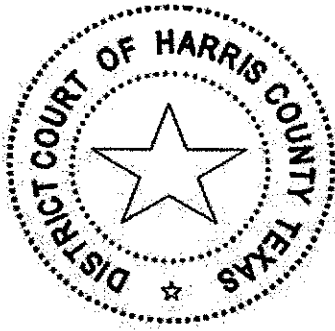
sclannie@aol.com

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Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Kassey DeWitt		kassey@lanniellaw.com	8/12/2022 9:31:02 AM	SENT
Christian R. Johnson		christianpllc@gmail.com	8/12/2022 9:31:02 AM	SENT



I, Marilyn Burgess, District Clerk of Harris County, Texas certify that this is a true and correct copy of the original record filed and or recorded in my office, electronically or hard copy, as it appears on this date.
Witness my official hand and seal of office this August 24, 2022

Certified Document Number: 103468888 Total Pages: 4

Marilyn Burgess, DISTRICT CLERK
HARRIS COUNTY, TEXAS

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